

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
Caption in Compliance with D.N.J. LBR 9004-2(c) WASSERMAN, JURISTA & STOLZ, P.C. 225 Millburn Avenue - Suite 207 P.O. Box 1029 Millburn, New Jersey 07041 Phone: (973) 467-2700 Fax: (973) 467-8126 <i>Counsel to Centennial Industrial Park</i> DONALD W. CLARKE	
In Re:	
MUNIRE FURNITURE COMPANY, INC.	
	Debtor.

Case No. 14-29229-CMG

Hon. Christine M. Gravelle

Hearing Date: January 20, 2015 at 10:00am.

**CERTIFICATION OF MICHAEL NACHTOME IN SUPPORT OF MOTION FOR THE
ENTRY OF AN ORDER COMPELLING THE DEBTOR AND HERITAGE TO COMPLY
WITH THE PROVISIONS OF THE CENTENNIAL LEASE AGREEMENT,
ESTABLISHING AN ADMINISTRATIVE PRIORITY LIEN ON THE SALE PROCEEDS
AND SHORTENING THE TIME FOR ASSUMPTION OR REJECTION,
OR, ALTERNATIVELY FOR STAY RELIEF**

**TO: HONORABLE CHRISTINE M. GRAVELLE
UNITED STATES BANKRUPTCY JUDGE**

I, **MICHAEL NACHTOME**, being of full age and having been duly sworn according to
law, hereby certifies as follows:

1. I am an authorized agent for Centennial Industrial Park, and, as such, I am familiar with this matter.
2. Centennial Industrial Park ("Centennial") owns the Debtor's warehouse and primary office space located at 91 New England Avenue, Piscataway, New Jersey (the "Premises"; or, in reference to the underlying lease and all subsequent amendments, the "Centennial Lease").

3. Centennial has been checking the Premises almost daily to monitor the status of operations and condition of the Premises.
4. The following conditions have been observed:
 - a. A non-operational elevator in violation of various codes which exposes visitors, the Debtor's and other employees to severe injury or death, and Centennial to litigation;
 - b. The Fire Suppressant System Post Indicator Valve is damaged and requires a new Tamper Switch. In its current condition, in the event of a fire the sprinkler may not operate properly exposing visitors, the Debtor's and other employees to severe injury or death, and Centennial to litigation;
 - c. A damaged power feed to a warehouse transformer requires a new electrical panel and poses an electrical fire risk exposing visitors, the Debtor's and other employees to severe injury or death, and Centennial to litigation;
 - d. Mold remediation due to neglect in fixing leaks in the roof. Water has infiltrated the building and mold is visible in the areas of the office tower posing health risks to employees and visitors;
 - e. Sidewalks are cracked and pose a personal injury hazard and expose Centennial to litigation;
 - f. The parking lot, driveways and curbs have suffered neglect and abuse and require repaving. Continued use without fixing will result in exponential deterioration of the parking lot, curbs, driveways and the value of the Premises;

- g. The loading docks and dock seals have suffered neglect and abuse and need to be repaired or replaced. Continued use without fixing will result in exponential deterioration of loading docks, dock seals and the value of the Premises;
 - h. The concrete stairs are cracked and damaged and need to be repaired or replaced. This poses a personal injury hazard and exposes Centennial to litigation;
 - i. Several areas of the building need masonry repairs. This poses a personal injury hazard and exposes Centennial to litigation; and
 - j. Various damage throughout the interior of the building, including to lighting fixtures and the ceiling (separate from the area of the breach resulting in water damage), poses a personal injury hazard and exposes Centennial to litigation.
5. The Debtor is obligated to promptly and safely maintain the Premises and repair conditions enumerated above.
6. I have reviewed this Certification and the Application submitted herewith and can attest to the accuracy and veracity of the representations made within.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

/s/Michael Nachtome

Date: December 30, 2014

MICHAEL NACHTOME
*Senior V.P. and General Counsel
of Centennial Industrial Park*